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November 17, 2010

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: **Roaming Obligations of Commercial Mobile Radio Service Providers**
WT Docket No. 05-265
Notice of Ex Parte Presentation

Dear Ms. Dortch:

On November 16, 2010, Joan Marsh and Robert W. Quinn, Jr., of AT&T held separate meetings with John Giusti, Office of Commissioner Michael J. Copps and Louis Peralta, Office of Commissioner Mignon Clyburn. On November 17, 2010, Jeanine Poltronieri, Joan Marsh, Michael Goggin, Gary Phillips and Colleen Thompson of AT&T, and David Lawson of Sidley, Austin, LLP, representing AT&T, met with representatives of the Wireless Telecommunications Bureau. Ruth Milkman, Jim Schlichting, Paul Murray, John Leibovitz, Nese Guendelsberger and Pat DeGraba attended the meeting on behalf of the Wireless Telecommunications Bureau.

The purpose of the meetings was to discuss the roaming obligations of wireless providers. The AT&T representatives expressed AT&T's views, consistent with AT&T's comments filed in this proceeding, that, contrary to allegations from regulation proponents, data roaming agreements are widely available and commonplace throughout the industry and should be negotiated on an individualized business-to-business basis without government intervention. Wireless carriers that have built data networks clearly have an incentive to enter into data roaming agreements on appropriate terms, and providers, including AT&T, are offering data roaming arrangements in the marketplace and will continue to do so with the evolution of their networks. Specifically, AT&T has already entered into over forty 2.5G data roaming agreements. AT&T has made 3G roaming offers to a number of carriers and is in the process of negotiating 3G roaming agreements with several carriers who utilize or intend to utilize compatible 3G technology. AT&T also summarized its position, as represented in its filings, that data roaming is a Private Mobile Service, as defined in Section 332 of the Telecommunications Act and thus any common carrier regulation of data roaming is prohibited under the terms of the statute.

In accordance with the Commission's rules, this letter is being filed electronically with your office for inclusion in the public record.

Sincerely,

/s/Jeanine Poltronieri

Copy:
John Giusti
Louis Pereatz
Ruth Milkman
Jim Schlichting
Paul Murray
John Leibovitz
Nese Guendelsberger
Pat DeGraba

